

# Variance Request Form



Company: Avangrid Renewables  
 Address: 1125 NW Couch Street, Suite 700  
 City, State, Zip : Portland, OR, 97209

Variance: VAR-014  
 Request No.: Rev 1  
 Date Submit: 07/03/17  
 Date Agency Received: \_\_\_\_\_  
 Agency Reference No.: \_\_\_\_\_

Request Prepared by: Kamber McAllister (ICF)  
 Spread/Location (Milepost): N/A

Net Acreage Affected: 21.10 (13.87 additional)

Landowner: BLM

Tract No.: N/A  
 In or Within 50ft of a Wetland:  Yes  No

Current Land Use/Vegetative Cover: Big Sagebrush Scrub, Chamise Chaparral, Disturbed Habitat, Montane Buckwheat Scrub, Redshank Chaparral, Scrub Oak Chaparral, Semi Desert Chaparral, Upper Sonoran Subshrub Scrub

Within 50ft of a Water Body:  Yes  No

Nearby Features (Water body, T&E Habitat, Wetlands, Noxious Weed): Waters are included on Figure 3.

Area, Residence, Cultural Resource Site (distance, etc.):

Variance Level:  Level 1  Level 2  Level 3 (To Be Assigned by Designated Representative)

Variance From:  Permit  Plan/Procedure  Specification  Drawing  Mitigation Measure  Other

**Detailed Description of Variance:** Attachments  Yes  No Photos?  Yes  No

Variance 14 (VAR-014) includes the additional pull areas for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure, as shown on Attachment A, Figures 1 and 2. The associated impacts by variance area are included in Attachment B.

The variance pull areas along the transmission line are at structure locations T-3, T-4, and T-12. The variance pull areas along the collector line are at structure locations C-1, C-10, C-12, C-23, C-27, C-38, C-40, C-41, C-43, C-50, C-51, C-52, and C-66. These structure locations are dead end structures meaning that the conductors terminate at this structure location. At a dead end structure, lines are pulled in both directions. The pull area requires equipment to pull large spools of wire from the last dead end structure, through the middle structures and to the next dead end structure. At a dead end structure location an area approximately 300 feet away from the structure location is needed to stage the pulling equipment. Staging equipment consists of a tensioner, a trailer with the spool of wire being pulled, additional spools of wire, and a rubber tire crane to lift the spools onto the trailer.

VAR-014 also includes shifting structure location [redacted] east approximately 56 feet to avoid impacting an ESA. The impacts by structure location are shown on Attachment A, Figures 1 and 2 and included in Attachment B. The variance areas are broken into additional temporary impacts and change of use areas. Change of use areas are the portions of Variance Areas that overlap approved engineering.

The access road to structure location C-34 was anticipated to be used in the original design, but the road was not specifically called out for use in the Notice to Proceed and is therefore being included in this variance. Use of the existing access road will require road widening from approximately 10 feet to approximately 20 feet. Impacts from widening of the existing access road will include clearing and grubbing and limited grading, and impacts to the existing access road will be limited to grading where necessary to smooth out the road. Impacts associated with road widening are temporary and will be restored consistent with the Project's Habitat Restoration Plan. The 10 foot wide existing access road will be used during O&M and the impacts are therefore considered permanent.

Construction methods used in these variance areas will be consistent with those included in the Project NTPs. All temporary impacts associated with the pull points and shift in structure location will be restored consistent with the Project's Habitat Restoration Plan.

Biological resources are shown on Figure 3. There are no impacts to quino checkerspot butterfly habitat or peninsular bighorn sheep critical habitat.

**Variance Justification:**



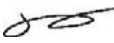

VAR-014 is required for constructability of the overhead transmission line and collector line portions of the Tule Wind project. The additional pull areas are needed at the structure locations listed above and in Attachment B due to the poles being a dead-end structures. Pull areas are typically 100 feet wide by 300 feet long and directly in line with the structures through which wire is to be pulled. To reduce impacts and avoid resources, the pull areas included in this variance have been designed to avoid known ESAs and angled to maximize overlap with approved disturbance limits to the extent possible. The shift of structure location [redacted] is being requested to avoid impacts to an ESA.

As mentioned above, the use of the existing road for access to overhead collector pole 34 was anticipated in the original design but not disclosed in the request for Notice to Proceed. After realizing this road was left out in error, access from the south (from pole 35) was evaluated and determined to be undesirable due to topography that would require complex road engineering and extensive additional impacts. Although the existing access road will require widening to allow construction equipment to access the overhead collection pole 34 structure location, doing so would allow construction of overhead collector pole 34 as designed and have relatively limited impacts of 0.37 acres total.

**For Avangrid Renewables Use Only**

Additional Surveys Required	Surveyed Corridor Description	Additional Surveys Completed
Cultural Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The variance is within existing cultural and biological resources survey areas, so additional surveys were not required. Supplemental confidential reporting associated with the cultural ESAs is being submitted separately.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
T & E Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Report Document Survey:

Sign-Off (as appropriate)	Name (print)	Approval Signature	Conditions (see attached)
Avangrid Permit Manager	Kristen Goland		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Lead Environmental Inspector	Talia Haley		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Designated Biologist	James Hickman		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Cultural Resource Specialist	Brian Williams		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**For BLM Project Manager or Compliance Contact Use Only**

Variance Approved:  Variance Denied:  Date:

Signature:

**For Compliance Manager and Monitor Use Only**

Variance Approved:  Variance Denied:  Date:

Signature:

Stipulations:

Spread:

Variance Request No.:

# VARIANCE CONDITIONS

Name:

Title:

Organization:

Conditions:

Name:

Title:

Organization:

Conditions:

Name:

Title:

Organization:

Conditions:

# Attachment A

Figures - REDACTED

# Attachment B

Variance Impacts by Site

## Attachment B

**Table 1: Impacts by Structure Location**

Structure Location	Impact Type	Additional Temporary Impacts (acres)	Variance Areas that Overlap Approved Engineering (acres)	Total Variance Area Temporary Impacts (acres) <sup>1</sup>	Additional Permanent Impacts (acres)	Variance Areas that Overlap Approved Engineering (acres)	Total Variance Area Permanent Impacts (acres) <sup>1</sup>
<b>Transmission Line</b>							
T-3	Pull Point	0.57	0.27	0.84	--		--
T-4	Pull Point	1.18	0.20	1.38	--		--
█	Shift in Structure Location	0.95	0.28	1.22	--		--
T-12 <sup>2</sup>	Pull Point	0.76	0.51	1.27	--		--
<b>Transmission Line Subtotal<sup>1</sup></b>		<b>3.45</b>	<b>1.26</b>	<b>4.71</b>	<b>--</b>		<b>--</b>
<b>Collection Line</b>							
C-1	Pull Point	0.42	0.27	0.69	--		--
C-10	Pull Point	0.24	0.45	0.69	--		--
C-12	Pull Point	0.83	0.53	1.37	--		--
C-23	Pull Point	0.80	0.50	1.30	--		--
C-27	Pull Point	0.90	0.50	1.40	--		--
C-34	Access Road	0.15	0.003	0.15	0.22	0.01	0.23
C-38	Pull Point	0.86	0.65	1.51	--		--
C-40 <sup>3</sup>	Pull Point	1.50	0.43	1.93	--		--
C-41 <sup>3</sup>	Pull Point	0.45	0.37	0.83	--		--
C-43	Pull Point	0.73	0.67	1.40	--		--
C-50 <sup>4</sup>	Pull Point	1.21	0.32	1.53	--		--
C-51 <sup>4</sup>	Pull Point	0.15	0.23	0.38	--		--
C-52	Pull Point	0.47	0.80	1.27	--		--
C-66	Pull Point	1.49	0.24	1.73	--		--
<b>Collection Line Subtotal<sup>1</sup></b>		<b>10.22</b>	<b>5.94</b>	<b>16.16</b>	<b>0.22</b>	<b>0.01</b>	<b>0.23</b>
<b>Variance Areas Total<sup>1</sup></b>		<b>13.67</b>	<b>7.20</b>	<b>20.87</b>	<b>0.22</b>	<b>0.01</b>	<b>0.23</b>

<sup>1</sup> Totals may not add due to rounding.

<sup>2</sup> Overlap of █ and █ variance areas is included in the acreage for █.

<sup>3</sup> Overlap of C-40 and C-41 variance areas is included in the acreage for C-40.

<sup>4</sup> Overlap of C-50 and C-51 variance areas is included in the acreage for C-50.